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Via ECF and Hand Delivery

February 6, 2020

The Honorable George B. Daniels
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street
New York, NY 10007

*Re: In Re: Terrorist Attacks on September 11, 2001, 03 MDL 1570 (GBD) (SN);
Lloyd A. Abel Sr. et al. v. Islamic Republic of Iran, No. 1:18-cv-12277 (GBD)
(SN)*

Dear Judge Daniels:

I represent plaintiffs in the above-referenced matter. We write in response to the Court's February 5, 2020 Order, MDL ECF No. 5859, requesting that we apprise the Court of claimant Francis L. Aversano's status in the *Abel* matter.

On January 10, 2020, we filed a Notice of Amendment in the above-referenced case to add as plaintiffs certain family members of individuals killed on September 11, 2001. MDL ECF No. 5493. In that Notice of Amendment we listed the names of the September 11, 2001 decedents, the names of the plaintiffs to be added, the relationship between each plaintiff and the 9/11 decedent, and the paragraphs of the Complaint discussing the 9/11 decedent. In that filing, as a result of a formatting error which we inadvertently overlooked, we cut off a portion of the entire name of claimant "Philip Aversano as Personal Representative of the Estate of Francis L. Aversano" and filed the claimant's name as "Philip Aversano as Personal." MDL ECF No. 5493, at line 1.¹

We have submitted to the Clerk of Court a corrected Notice of Amendment which completely lists "Philip Aversano as Personal Representative of the Estate of Francis Aversano," and ask that this Court grant our motion for judgment.

¹ The Notice of Amendment added two siblings—Philip Aversano and Francis L. Aversano, who died post-September 11, 2001. Philip was appointed as administrator of his brother's estate by the Kings County Surrogate on November 4, 2011, attached herein. Francis L. Aversano was listed as a claimant added by Notice of Amendment in Exhibit C to the Declaration of Jerry S. Goldman, Esq. MDL ECF No. 5586-3.

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We thank the Court for its attention to this matter, and apologize for this error.

Respectfully submitted,

/s/ Jerry S. Goldman
Jerry S. Goldman, Esq.

Enclosures

cc: The Honorable Sarah Netburn
U.S. Magistrate Judge
Thurgood Marshall United States Courthouse
40 Foley Square, Room 430
New York, NY 10007

via Hand Delivery

All counsel *via ECF*